

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**DAVID SAMBRANO, et al., individually,  
and on behalf of all others similarly  
situated,**

**Plaintiffs,**

**V.**

**UNITED AIRLINES, INC.,**

**Defendant.**



**Civil Action No.**

**4:21-CV-01074-P**

## **DEFENDANT'S DESIGNATION OF CLASS CERTIFICATION EXPERTS**

Defendant United Airlines, Inc. (“Defendant” and/or “United”) makes the following disclosures pursuant to the Court’s March 27, 2023 Order Regarding Class Certification and Discovery. [Clerk’s Dkt No. 164]

Donald R. Deere, Ph.D.  
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Dr. Deere may submit a written expert report concerning issues related to class certification pertaining to backpay and/or damages calculations. Dr. Deere has a Ph.D. in Economics from Massachusetts Institute of Technology and a BS in Economics from Texas A&M University. In 2007, Dr. Deere retired from the tenured faculty of the Department of Economics at Texas A&M University, where he taught courses in labor economics, economic principles, and public finance.

Any written report, prepared and signed by Dr. Deere and containing the information required by Rule 26(a)(2)(B)(i)-(vi), will be served on all parties of record once the report is

completed. Any such report will be completed once Plaintiffs fully respond to United's written discovery and the depositions of the named plaintiffs are completed.

Dated: April 24, 2023

Respectfully submitted,

/s/ Russell D. Cawyer

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**ATTORNEYS FOR DEFENDANT  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served via e-mail to all counsel of record this 24th day of April, 2023:

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